

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

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In Re:)
)
Amendment of Section 73.202(b))
Table of FM Allotments)
(Healdton, OK and Krum, TX))

MM Docket 98-50
RM-9247

MAR 1 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: John Karousos, Chief
Allocations Branch

SUPPLEMENT TO COMMENTS OF PETITIONER

Petitioner AM & PM Broadcasters, LLC, licensee of KICM (FM), Healdton, OK, respectfully submits this Supplement to its June 1, 1998 Comments in support of the proposal in NPRM, MM Docket No. 98-50, DA 98-659, released April 10, 1998. ^{1/}

In response to the NPRM's question whether the proposed downgrade and reallocation of channel 229C3 from Healdton to Krum, might result in depriving Healdton of its only existing local transmission service, Petitioner submitted two, separate arguments in support of such reallocation. ^{2/} There is now a third argument in support of the proposed reallocation to Krum.

^{1/} The Petition for Rule Making sought (i) to amend the FM Table of Allotments to substitute channel 229C3 for channel 229C2 at Healdton, OK, (ii) to reallocate channel 229C3 from Healdton to Krum, TX and (iii) to modify the license for station KICM accordingly, so as to provide a "first local transmission service" for the rapidly growing city of Krum.

^{2/} First, channel 249C3 at Pauls Valley, OK, has been proposed as a reallocation to Healdton, OK. Second, even if one ignores the proposal to reallocate the Pauls Valley FM channel to Healdton, the public interest strongly favors the reallocation. Krum is a rapidly growing city whose substantial need for a "first local service" strongly outweighs the modest and shrinking interests of Healdton. See Comments of Petitioner, filed June 1, 1998 at paragraphs 4-9.

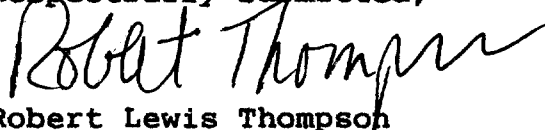
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List A B C D E

Petitioner's engineering consultant has discovered that another FM channel is available for allotment to Healdton if channel 229C3 is reallocated to Krum. Consonant with FCC separation rules, Channel 230C3 can be allocated to Healdton at a reference point that provides city-grade coverage to the entire community of Healdton. See Engineering Statement, Appendix A.

CONCLUSION

The public interest would be greatly served by the reallocation of channel 229C3 from Healdton to Krum and the modification of the license of station KICM (FM) to specify operation on the new channel at Krum. If allocated, the licensee will file an application to construct the new facility and, after the CP is granted, will build and operate the new facility at Krum.

Respectfully submitted,



Robert Lewis Thompson
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908 King Street, Suite 300
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Counsel for Petitioner

March 1, 1999

cc: KICM-FM Local Public File

Engineering Statement

David Garland, being duly sworn, does state:

1. My name is David Garland and I am a technical consultant to AM & PM Communications, LLC, licensee of KICM-FM, Healdton, OK. I have prepared the attached engineering exhibits and tables, in further support of Petitioner's proposal in MM Docket No. 98-50.

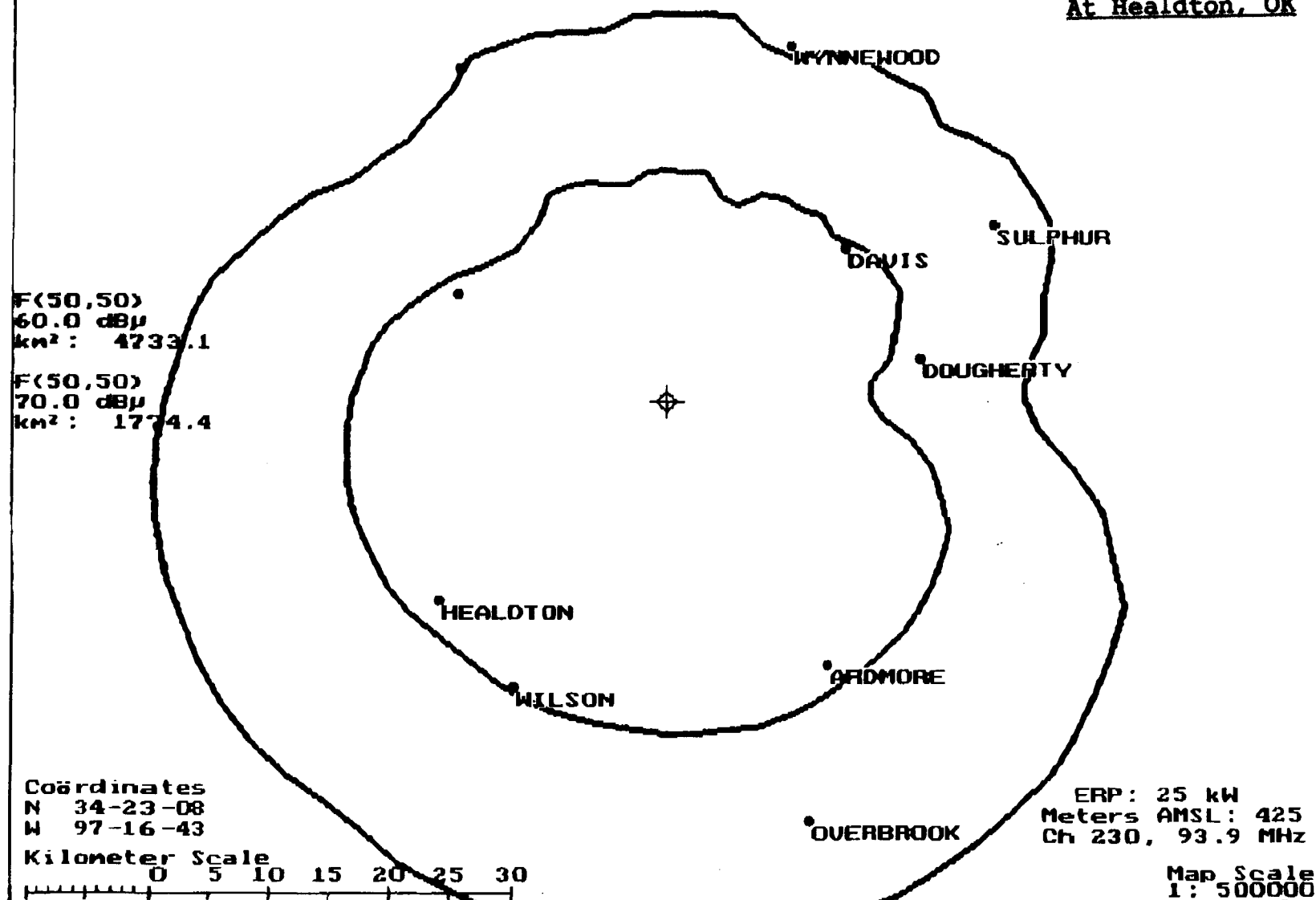
2. Channel 230C3 could be allocated to Healdton, OK, at a reference point of 34-23-8-N and 97-16-43W, in full compliance with all FCC spacing, service and protection rules. See Attachments 1, 2 and 3. Executed under penalty of perjury this 28th day of February 1999.



David Garland

PG-10-6863

Attachment 1
Ch. 230C3
At Healdton, OK



Attachment 2
Ch. 230C3
At Healdton, OK

Average of 0° radial:	1177.6 ft. (358.9 m.)	AMSL;	216.8 ft. (66.1 m.)	A.A.T.
Average of 45° radial:	1173.7 ft. (357.8 m.)	AMSL;	220.6 ft. (67.2 m.)	A.A.T.
Average of 90° radial:	1218.1 ft. (371.3 m.)	AMSL;	176.2 ft. (53.7 m.)	A.A.T.
Average of 135° radial:	922.3 ft. (281.1 m.)	AMSL;	472.1 ft. (143.9 m.)	A.A.T.
Average of 180° radial:	908.8 ft. (277.0 m.)	AMSL;	485.6 ft. (148.0 m.)	A.A.T.
Average of 225° radial:	934.3 ft. (284.8 m.)	AMSL;	460.1 ft. (140.2 m.)	A.A.T.
Average of 270° radial:	1001.6 ft. (305.3 m.)	AMSL;	392.7 ft. (119.7 m.)	A.A.T.
Average of 315° radial:	1203.9 ft. (367.0 m.)	AMSL;	190.4 ft. (58.0 m.)	A.A.T.

Terrain averaging study in meters at N. 34 23 8, W. 97 16 43.

Average terrain height: 1067.5 feet, or 325.4 meters.

HAAT, based on 8 radials, with an Antenna radiation center equal to 1394.3 feet, or 425.0 meters AMSL, is **326.8 feet, or 99.6 meters.**

MAPEM search of channel 230C3 (93.9 MHz), at N. 34 23 8, W. 97 16 43.

Searching Channel 230C3 (93.9 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Newcastle	OK	227	C1	U	57.7	47.2	341.5°	10.5
KKNGFM	Newcastle	OK	227	C1	L	58.4	47.2	341.9°	11.2
ALC	Healdton	OK	229	C2	U	24.0	72.7	187.5°	-48.7
KICM	Healdton	OK	229	C2	D	24.0	72.7	187.5°	-48.7
KICM	Healdton	OK	229	C2	L	24.0	72.7	187.5°	48.7
KICM	Krum	TX	229	C3	A	65.5	61.5	172.8°	4.0
ALC	Paris	TX	230	C2	U	109.5	110.0	111.3°	-0.5
ALC	Seymour	TX	230	C2	V	126.3	110.0	244.3°	16.3
KOYN	Paris	TX	230	C2	L	111.0	110.0	110.3°	1.0
ALC	Lawton	OK	231	C2	U	69.7	72.7	280.7°	-3.0
KZCD	Lawton	OK	231	C2	L	72.8	72.7	279.0°	0.1
ALC	Fort Worth	TX	231	C	U	125.1	109.4	171.8°	15.7
KLTY	Fort Worth	TX	231	C	A	128.1	109.4	171.9°	18.7
KLTY	Fort Worth	TX	231	C	L	125.1	109.4	171.8°	15.7
ALC	Gainesville	TX	233	C	U	55.7	59.7	165.9°	-4.0
KDCE	Gainesville	TX	233	C	L	59.8	59.7	162.2°	0.1
KDGE	Gainesville	TX	233	C	L	59.8	59.7	162.2°	0.1
ALC	Wynnewood	OK	283	A	A	19.0	7.5	19.7°	11.5
ALC	Pauls Valley	OK	283	A	A	24.7	7.5	7.8°	17.2